

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN RE: STERICYCLE, INC., STERI-SAFE
CONTRACT LITIGATION

No. 1:13-cv-05795
MDL No. 2455

Judge Robert W. Gettleman

PLAINTIFFS' UNOPPOSED MOTION FOR ENTRY OF FINAL JUDGMENT

On March 8, 2018, the Court granted Final Approval of the Settlement Agreement (Dkt. No. 382) and instituted procedures permitting certain Stericycle customers who submitted deficient opt-out notices to either cure the deficiencies or be considered a part of the Class. That process has been completed, as described in the parties' Joint Status Report (Dkt. No. 405) and the declaration of the Settlement Administrator (Dkt. No. 408-1).

Although there are open issues relating to the timeliness and validity of certain opt-out requests (and the related motions filed by counsel for certain individuals and entities who submitted requests to be excluded from the Settlement), Plaintiffs believe those issues are ripe for decision as the parties have exhausted good-faith attempts to resolve the outstanding issues with opt-out counsel. As a result, the Court should be in a position to adopt a Final Opt-Out List at or following the May 3, 2018 hearing. Once the Court has adopted and approved a Final Opt-Out list,¹ no further obstacles prevent the entry of final judgment.

Plaintiffs therefore respectfully request that the Court enter final judgment upon the Settlement Agreement consistent with its Final Approval Order and adoption of a Final Opt-Out List. Counsel for Stericycle has informed Plaintiffs' Class Counsel that it does not oppose entry of judgment in the form proposed by Plaintiffs' Class Counsel (and submitted to the Court as a Proposed Final Judgment).

¹ Plaintiffs believe that the list submitted with the Settlement Administrator's declaration on April 26, 2018, should be adopted and approved. However, if the Court orders changes to that list, then Plaintiffs seek entry of judgment based upon the Final Approval Order and the Final Opt-Out List in the form ultimately approved by the Court.

DATED: April 30, 2018

Respectfully submitted,

By: /s/ Steve W. Berman

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Class Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed electronically via the Court's ECF system, on April 30, 2018. Notice of electronic filing will be sent to all parties by operation of the Court's electronic filing system.

DATED: April 30, 2018

HAGENS BERMAN SOBOL SHAPIRO LLP

By: */s/ Steve W. Berman*
STEVE W. BERMAN